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8 Attorneys for GMAC MORTGAGE, LLC, its successors and/or assigns

10 UNITED STATES BANKRUPTCY COURT

11 DISTRICT OF NEVADA

12 In re

13 JOANNE PENNY,

14 Debtor(s).

Bankruptcy Case No. BK-S-08-18027-bam

Chapter 7

GMAC MORTGAGE, LLCS REQUEST  
FOR SPECIAL NOTICE AND SERVICE  
OF PAPERS AND RESERVATION OF  
RIGHTS

17 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL

19 INTERESTED PARTIES

20 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for GMAC  
21 Mortgage, LLC, its successors and/or assigns, hereby requests special notice of all events relevant  
22 to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the  
23 above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy  
24 Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests  
25 for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of  
26 all matters which must be noticed to creditors, creditors committees and parties-in-interest and other  
27 notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the  
28 above-referenced bankruptcy court.

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the Master  
2 Mailing List in this case, the following address be used:

3  
4 ELSIE L. SECOQUIAN  
PITE DUNCAN, LLP  
4375 Jutland Drive  
5 Suite 200  
6 San Diego, CA 92117

7 Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,  
8 proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a  
9 waiver of the within party's:

10 a. Right to have any and all final orders in any and all non-core matters entered only  
11 after de novo review by a United States District Court Judge;

12 b. Right to trial by jury in any proceeding as to any and all matters so triable herein,  
13 whether or not the same be designated legal or private rights, or in any case, controversy or  
14 proceeding related hereto, notwithstanding the designation or not of such matters as "core  
15 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant  
16 to statute or the United States Constitution;

17 c. Right to have the reference of this matter withdrawn by the United States District  
18 Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

19 d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to  
20 which this party is entitled under any agreements at law or in equity or under the United States  
21 Constitution.

22 All of the above rights are expressly reserved and preserved by this party without  
23 exception and with no purpose of confessing or conceding jurisdiction in any way by this filing  
24 or by any other participation in these matters.

25 Dated: August 11, 2008

/s/ Elsie L. Secoquian  
4375 Jutland Drive  
Suite 200  
San Diego, CA 92117  
(702) 413-9692  
NV Bar #9685  
Attorney for GMAC MORTGAGE, LLC, its  
successors and/or assigns

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on August 11, 2008.

Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

Joanne Penny  
4349 Soria Way  
Las Vegas, NV 89121

Yvette Weinstein  
6450 Spring Mtn Rd #14  
Las Vegas, NV 89146

U.S. Trustee  
Department of Justice  
300 Las Vegas Boulevard. So.  
Suite 4300  
Las Vegas, NV 89101

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on August 11, 2008, at San Diego, California.

/s/ Mary K. Arnold